



Making Connections That Make a Difference

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Via Electronic Filing

November 28, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Compliance Letter
***E911 Requirements for IP-Enabled Service Providers*, WC Docket No.**
05-196

Dear Ms. Dortch:

In accordance with Section 9.5(f) of the Commission's Rules¹ and paragraph 50 of the First Report and Order released by the Commission in the subject proceeding on June 3, 2005 ("Order"),² Broadview Networks, Inc. ("Broadview") hereby notifies the Commission of its compliance with Part 9 of the Commission's Rules.³

Broadview currently provides as a standard service feature to all of its existing VoIP service end-user customers enhanced 911 ("E911") capabilities

¹ 47 C.F.R. § 9.5(f).

² *IP- Enabled Services* (First Report and Order), 20 FCC Rcd. 10273, ¶ 50 (FCC 2005).

³ 47 C.F.R. § 9.1 *et.al.*

identical in functionality to the E911 capabilities that Broadview provides its POTS and other circuit-switched wireline service subscribers.

Broadview currently provides VoIP service to end users only within its network “footprint” which includes all or portions of New York, New Jersey, Pennsylvania, Massachusetts, Rhode Island and New Hampshire. Broadview does not market and will not provide VoIP service to end users outside of its network footprint.⁴

Broadview does not offer or provide a portable interconnected VoIP service to end users. Broadview provisions its retail VoIP service only on dedicated Internet access T-1 circuits and does not support nomadic use of this service. The retail Broadview VoIP service is available and will work only at the location to which the associated dedicated Internet access T-1 circuit is connected.⁵

Within its network footprint, Broadview transmits all VoIP-originated 911 calls to the appropriate public safety answering point (“PSAP”), designated statewide default answering point, or the appropriate local emergency authority utilizing the Selective Router, the trunk lines between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized. As of the date of this letter, Broadview has interconnected, directly or indirectly, with thirty Selective Routers located in New York, New Jersey, Pennsylvania, Massachusetts, Rhode Island and New Hampshire.

Broadview transmits via the Wireline E911 Network its VoIP 911 callers’ automatic numbering information (“ANI”) and Registered Location to all answering points that are capable of receiving and processing this information. It is Broadview’s understanding that all answering points within its current VoIP service area are capable of receiving and processing the ANI and Registered Location information that it transmits and hence that the ANI and Registered Location information of all of its end user VoIP

⁴ Currently, Broadview is marketing its VoIP service to end users only within the New York Metro LATA – LATA 132.

⁵ Broadview makes clear to its VoIP service customers that is VoIP service is a fixed service that is functional only at its sole interconnected location.

subscribers are currently being transmitted to answering points that are capable of receiving and processing the information.

Although, as noted above, Broadview does not currently offer or provide VoIP service to end users outside of its network footprint and does not currently provide a portable interconnected VoIP service to end users and has no plans to do otherwise, it nonetheless has contracted with Intrado, Inc. ("Intrado") to ensure the availability to it of Intrado's "V9-1-1 solution." Intrado's V9-1-1 solution is a comprehensive mechanism for nationwide delivery of VoIP-originated E911 calls to the most geographically-appropriate PSAP.⁶ As of the date of this letter, Intrado has achieved major market deployment of its V9-1-1 solution and is targeting near nationwide native VoIP E911 delivery by mid 2006. Through Intrado, Broadview currently has access to 154 E911 Selective Routers.⁷

As part of its service ordering process, Broadview has obtained, and will continue to obtain, from each of its VoIP service end user customers prior to the initiation of service, the fixed physical location at which both the dedicated Internet access T-1 circuit associated with the service will be installed and the service will be utilized. Broadview has obtained and continues to obtain the initial Registered Location of one hundred percent of its VoIP service end user customers.

A Broadview VoIP service end user customer desiring to change its Registered Location must submit an order to Broadview to redeploy the dedicated Internet access T-1 circuit associated with the service. Such orders may be submitted to Broadview by telephone (including the equipment the customer uses to access its VoIP service), facsimile or email.

In the event that Broadview were to offer its end user VoIP service customers a portable interconnected VoIP service, Intrado, as part of its "V9-1-1 Mobility Service," would provide Broadview with a viable technical solution for accommodating nomadic subscribers. Intrado's "V9-1-1 Mobility Service" provides near real time validation and delivery of updated Registered

⁶ Broadview has made available Intrado's V9-1-1 solution to the limited number of VoIP service providers to which it provides VoIP service on a wholesale basis.

⁷ In mid 2006, Intrado projects that it will provide access to 250 Selective Routers.

Marlene H. Dortch
November 28, 2005
Page 4

Location information, as well as associated interconnection and E911 call routing and delivery capability.

If you have any questions regarding this matter, please feel free to contact the undersigned.

Respectfully submitted,

/s/

Charles C. Hunter
Executive Vice President and General

Counsel

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